

Exhibit B

From: [Werlwas, Mary Lynne](#)
To: [Joyce, Kimberly \(Law\)](#); [Powell, Jeffrey K. \(USANYS\) 4](#); [Debbie Greenberger](#)
Cc: [Jonathan S. Abady](#); [Simpson, Kayla](#); [Billingsley, David](#); [Nairuby Beckles](#); [Nunez-NYC](#); [Steve Martin](#); [Guillaume, Melissa](#); [Sana Mayat](#); [Anna Friedberg](#); [Hendy, Cherae](#); [Wolecki, Hilary](#); [Baranchuk, Victoriya](#); [Shechtman, Paul \(DOC\)](#); [Iodice, Ashley \(Law\)](#); [Neufeld, Sheryl \(Law\)](#); [Mooklal, Stefan \(LAW\)](#); [Eshkenazi, Lara \(USANYS\)](#); [Maginley-Liddie, Lynelle](#)
Subject: Re: [EXTERNAL] Post-10/28 Meet and Confer
Date: Wednesday, October 26, 2022 8:04:43 AM

Please do circulate a link. Thank you.

Mary Lynne

Mary Lynne Werlwas

Director

Prisoners' Rights Project

Tel: [REDACTED]

she/her

From: Joyce, Kimberly (Law) [REDACTED]
Sent: Wednesday, October 26, 2022 8:00 AM
To: Powell, Jeffrey K. (USANYS) 4 [REDACTED]; Debbie Greenberger [REDACTED]; Werlwas, Mary Lynne [REDACTED]
Cc: Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa [REDACTED]; Sana Mayat [REDACTED]; Anna Friedberg [REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary [REDACTED]; Baranchuk, Victoriya [REDACTED]; Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law) [REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW) [REDACTED]; Eshkenazi, Lara (USANYS) [REDACTED]; Maginley-Liddie, Lynelle [REDACTED]
Subject: Re: [EXTERNAL] Post-10/28 Meet and Confer

Law and DOC can do 11/3 at 3:30, when SDNY is available. Should I circulate another video link?

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From: Powell, Jeffrey K. (USANYS) 4 [REDACTED]
Sent: Tuesday, October 25, 2022 5:24:18 PM
To: Joyce, Kimberly (Law) [REDACTED]; Debbie Greenberger [REDACTED]; Werlwas, Mary Lynne [REDACTED]
Cc: Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa [REDACTED]

Subject: RE: [EXTERNAL] Post-10/28 Meet and Confer

The SDNY could do 11/3 at 3:30 pm or later or 11/9 in the morning.

Jeffrey K. Powell

Co-Chief

Civil Frauds Unit

Southern District of New York

Response	Percentage
Strongly agree	65%
Agree	25%
Disagree	5%
Strongly disagree	5%

████████████████████

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Debbie Greenberge [REDACTED]
Sent: Sunday, October 23, 2022 10:18:59 PM
To: Werlwas, Mary Lynne [REDACTED]; Joyce, Kimberly (Law) [REDACTED]
Cc: Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED]
Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-
NYC [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa
[REDACTED]; Sana Mayat [REDACTED]; Anna Friedberg
[REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary
[REDACTED]; Baranchuk, Victoriya [REDACTED];
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law)
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW)
[REDACTED]; 'Jeff Powell ([REDACTED]; 'Lara
Eshkenazi [REDACTED]; Maginley-Liddie, Lynelle
[REDACTED]; Sana Mayat [REDACTED]
Subject: [EXTERNAL] Post-10/28 Meet and Confer

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Hope everyone had a nice weekend and adding Sana who has newly joined the case from ECBAWM. As Mary Lynne indicated below, we wanted to provide you with dates of availability for meeting and conferring after October 28 on other disputes that may arise in connection with that report. Plaintiffs can confer on 11/3 after noon or 11/4 after noon. Please let us know what works for the City and DOJ.

Debbie Greenberger

she/her

Partner

Emery Celli Brinckerhoff Abady Ward & Maazel LLP

600 Fifth Ave at Rockefeller Plaza, 10th Floor

New York, NY 10020

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Werlwas, Mary Lynne [REDACTED]

Sent: Thursday, October 20, 2022 12:07 PM

To: Joyce, Kimberly (Law) [REDACTED]

Cc: Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED];

Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-

NYC [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa

[REDACTED]; Sana Mayat [REDACTED]; Debbie Greenberger

[REDACTED]; Anna Friedberg [REDACTED]; Hendy, Cherae

[REDACTED]; Wolecki, Hilary [REDACTED]; Baranchuk, Victoriya

[REDACTED]; Shechtman, Paul (DOC) [REDACTED];

Iodice, Ashley (Law) [REDACTED]; Neufeld, Sheryl (Law) [REDACTED];

Mooklal, Stefan (LAW) [REDACTED]; 'Jeff Powell [REDACTED]

[REDACTED]; 'Lara Eshkenazi [REDACTED]

[REDACTED]; Maginley-Liddie, Lynelle [REDACTED]

Subject: [EXTERNAL] Follow-up to meet and confer on intake, death data

This Message originated outside your organization.

Kim,

We write to follow up to the meet and confer held this morning on the non-compliance and document request issues raised in our August 11 and August 26, 2022 notices.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

As noted at the meeting, we will write separately to provide you with dates of availability for meeting and conferring after October 28 on other disputes that may arise in connection with that report.

Mary Lynne

Mary Lynne Werlwas
Director
Prisoners' Rights Project
Tel: [REDACTED]
she/her

From: Joyce, Kimberly (Law) [REDACTED]
Sent: Thursday, October 13, 2022 10:56 AM
To: Debbie Greenberger [REDACTED] Anna Friedberg [REDACTED]
[REDACTED]
Cc: Werlwas, Mary Lynne [REDACTED]; Jonathan S. Abady [REDACTED]
Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED] Levin (e),
Madison [REDACTED]; Nairuby Beckles [REDACTED] Nunez-NYC [REDACTED]
[REDACTED]; Steve Martin [REDACTED] Guillaume, Melissa
[REDACTED]; Hendy, Cherae [REDACTED] Wolecki, Hilary
[REDACTED]; Baranchuk, Victoriya [REDACTED];
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law)
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW)
[REDACTED]; 'Jeff Powell [REDACTED] 'Lara
Eshkenazi [REDACTED] Maginley-Liddie, Lynelle
[REDACTED]
Subject: RE: [EXTERNAL] RE: Nunez Plaintiffs' Letter re In-custody Deaths

Thanks, Debbie. Confirmed for 10/20 from 9-10. I'll send a video link to this group by tomorrow.

Kim

From: Debbie Greenberger [REDACTED]
Sent: Thursday, October 13, 2022 9:50 AM
To: Joyce, Kimberly (Law) [REDACTED]; Anna Friedberg [REDACTED]
Cc: Werlwas, Mary Lynne [REDACTED]; Jonathan S. Abady [REDACTED]
Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Levin (e),
Madison [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED]
[REDACTED]; Steve Martin [REDACTED] Guillaume, Melissa
[REDACTED]
[REDACTED] Baranchuk, Victoriya [REDACTED]
Shechtman, Paul (DOC) [REDACTED] Iodice, Ashley (Law)

Subject: RE: [EXTERNAL] RE: Nunez Plaintiffs' Letter re In-custody Deaths

Kim,

Plaintiffs and DOJ can do 10/20 from 9-10. Please let me know if you will be circulating the zoom or I should.

Best
Debbie

Debbie Greenberger
she/her
Partner
Emery Celli Brinckerhoff Abady Ward & Maazel LLP
600 Fifth Ave at Rockefeller Plaza, 10th Floor
New York, NY 10020

[illegible]

11/11/2014

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Age Group	Percentage of Respondents Vaccinated
18-24	25%
25-34	15%
35-44	15%
45-54	100%
55-64	85%
65-74	85%
75-84	35%
85+	45%
Don't know	30%

From: Joyce, Kimberly (Law) [REDACTED]
Sent: Friday, September 23, 2022 5:21 PM
To: Anna Friedberg [REDACTED]; Debbie Greenberger

[REDACTED]
Cc: Werlwas, Mary Lynne [REDACTED]; Jonathan S. Abady [REDACTED];
Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Levin (e),
Madison [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED];
[REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa
[REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary
[REDACTED]; Baranchuk, Victoriya [REDACTED];
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law)
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW)
[REDACTED]; 'Jeff Powell [REDACTED]' [REDACTED]; 'Lara
Eshkenazi ([REDACTED]); Maginley-Liddie, Lynelle
[REDACTED]

Subject: Re: [EXTERNAL] RE: Nunez Plaintiffs' Letter re In-custody Deaths

This Message originated outside your organization.

Counsel,

Please find attached the City's response to your letters dated August 16th and September 16th. We look forward to hearing from you.

Thank you,
Kim

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From: Anna Friedberg [REDACTED]
Sent: Friday, September 23, 2022 4:48 PM
To: Debbie Greenberger <[REDACTED]>
Cc: Werlwas, Mary Lynne [REDACTED]; Jonathan S. Abady [REDACTED]
Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Levin (e),
Madison [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED];
[REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa
[REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary
[REDACTED]; Baranchuk, Victoriya [REDACTED];
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law)
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW)
[REDACTED]; 'Jeff Powell [REDACTED]' [REDACTED]; 'Lara
Eshkenazi [REDACTED]; Maginley-Liddie, Lynelle
[REDACTED]; Joyce, Kimberly (Law) [REDACTED]
Subject: [EXTERNAL] RE: Nunez Plaintiffs' Letter re In-custody Deaths

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